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July 22, 2014

BY ECF

Honorable Alison J. Nathan
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, New York 10007

Re: AIG v. Benjamin M. Lawskey, 14 CV 2355 (AJN)

Dear Judge Nathan:

This Office represents Benjamin Lawskey as Superintendent of Financial Services (the "Superintendent"), in the above referenced matter. We write to request an expansion of the Court's page limit for the Superintendent's reply on his motion to dismiss the amended complaint, from the current 20 pages, to 26 pages.

This action challenges the Department's current and ongoing investigation of AIG for violations of the New York Insurance Law. In light of the status of the investigation and the State's significant policy interest in this matter, the Superintendent's motion, which was served and filed on June 20, 2014, seeks dismissal pursuant to Rule 12(b)(1) under three abstention doctrines and two prudential doctrines, pursuant to which the Court should refrain from exercising federal jurisdiction, and lack of Article III standing and ripeness. In addition, the motion seeks dismissal for failure to state a claim pursuant to Rule 12(b)(6) of each of the three different constitutional claims asserted in the amended complaint: that the challenged statutes as applied to AIG are void for vagueness and violate the due process clause, violate the First Amendment, and are inconsistent with the requirements of the dormant Commerce Clause.

The memorandum in support of the motion to dismiss is, with the permission of the Court, 45 pages. AIG's opposition to the motion, served two weeks ago on July 7, 2014, is also 45 pages and raises many arguments in opposition not treated in the Superintendent's original memorandum. Although this Office has not yet completed drafting the reply due this Friday, the

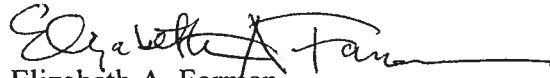
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current 20 limit is, in light of the number and variety of issues raised in opposition, and based on our current draft, insufficient to permit the Superintendent to address plaintiff's basic positions adequately.

AIG counsel has informed us that it has no objection to a request by defendant for a few extra pages. Accordingly, although we will make every effort to be concise and keep the reply memorandum under the requested page limit, we respectfully request an expansion of the Court's page limit for reply to 26 pages.

Thank you for your consideration of this application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Elizabeth A. Forman", with a long horizontal flourish extending to the right.

Elizabeth A. Forman
Assistant Attorney General

cc: All counsel of record (by ECF)